

IN THE UNITED STATE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

RICHARD E. BELL, JR. and
KAREN K. BELL, Individually and as
Guardians of the Property of BRIAN E. BELL,
BRANDEN R. BELL, and BRIAN E. BELL,

CIVIL ACTION

Plaintiffs,

FILE No. 7:16-cv-00016-HL

vs.

FREDERIC A. ROSEN AND JOHNSON
PUBLISHING COMPANY, LLC a/k/a
JOHNSON PUBLISHING COMPANY, INC.,

Defendants.

PLAINTIFFS' MOTION AND BRIEF TO FILE DOCUMENTS UNDER SEAL

COME NOW Plaintiffs in the above-captioned case, and, within the time permitted by this Court's May 5, 2016 Order granting jurisdictional discovery (ECF 10), file this Plaintiffs' Motion and Brief to File Documents Under Seal, showing the Court as follows:

On May 27, 2016, the parties submitted a Stipulated Protective Order regarding jurisdictional discovery only in the above-captioned case (ECF 12, para. 10, p. 9) prepared by Defendant's counsel. Under paragraph 10 of the protective order, any document or pleading containing "FOR ATTORNEY'S EYES ONLY" information must be filed under seal. Accordingly, Plaintiffs' are submitting under seal their Brief in Opposition To Defendant's Motion to Dismiss for Lack of Subject Matter Jurisdiction (hereinafter "Opposition Brief"), which references facts and exhibits obtained from documents produced by Rosen prior to his

deposition that were all designated "FOR ATTORNEY'S EYES ONLY".¹

WHEREFORE, Plaintiffs' request that their Motion to File Documents Under Seal be granted.

Respectfully submitted this 15th day of June, 2016.

LADSON LAW FIRM, P.C.

By: /s/ M. Brice Ladson
M. BRICE LADSON
Ga. Bar No. 431071
ATTORNEY FOR THE PLAINTIFFS

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ATTORNEYS FOR THE PLAINTIFFS

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¹ Plaintiffs' do not agree that this motion should be necessary since the documents at issue have been improperly classified "FOR ATTORNEY'S EYES ONLY". Plaintiffs' are thus filing a separate Motion to unseal the Rosen discovery materials used as exhibits in their Opposition Brief.

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Defendants.

Certificate of Service

I hereby certify that I have this day served a copy of the foregoing Motion upon all parties to this matter by filing this Motion electronically with the United States District Court, Middle District of Georgia, Valdosta Division, addressed to counsel of record as follows:

Gail Podolsky
Carlton Fields Jorden Burt, P.A.
1201 West Peachtree Street, Suite 3000
Atlanta, Georgia 30309
gpodolsky@carltonfields.com

THIS 15th day of June, 2016.

LADSON LAW FIRM, P.C.

By: /s/ M. Brice Ladson
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ORDER

Plaintiffs having filed their Motion to File Documents Under Seal pursuant to the Stipulated Protective Order of the parties dated May 27, 2016 in the above-captioned case,¹ and it appearing to the Court that the Stipulated Protective Order requires that substantial portions of Plaintiff's Brief in Opposition to Defendant's Motion to Dismiss for Lack of Subject Matter Jurisdiction be filed under seal,

IT IS HEREBY ORDERED that Plaintiffs' Motion to File Motion Under Seal is GRANTED, and that Plaintiff's Brief in Opposition to Defendant's Motion to Dismiss for Lack of Subject Matter Jurisdiction, with attached exhibits, be filed under seal.

THIS 15th day of June, 2016.

1 Plaintiff's are filing a separate Motion to unseal the Rosen discovery materials used in their Brief in opposition to Defendant's Motion to Dismiss for Lack of subject Matter Jurisdiction.

By:

The Honorable HUGH LAWSON,
Senior Judge
United States District Court –
Middle District of Georgia –
Valdosta Division

SUBMITTED BY:

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